

UNITED STATES DISTRICT COURT FILED
IN CLERK'S OFFICE
FOR THE DISTRICT OF MASSACHUSETTS

2004 JUL 14 P 12:43

ASCENTIAL SOFTWARE CORPORATION,

Plaintiff,

v.

RUSSELL DODSON,

Defendant.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Civil Action No. 04-CV-40130-DPW

**MOTION TO PERMIT ROBERT W. STONE
TO APPEAR *PRO HAC VICE***

Christopher B. Kaczmarek, attorney for defendant Russell Dodson in the above-captioned matter, moves pursuant to Rule 83.5.3(b) of the Local Rules of the United States District Court for the District of Massachusetts for the admission, *pro hac vice*, of Robert W. Stone. The basis for this motion is as follows:

1. Robert W. Stone is a partner in the law firm of Quinn Emanuel Urquhart Oliver & Hedges, LLP in Redwood Shores, California and is counsel for Russell Dodson.
2. Mr. Stone is a member in good standing in every jurisdiction where he has been admitted to practice.
3. There are no disciplinary proceedings pending against Mr. Stone as a member of any bar in any jurisdiction.
4. Mr. Stone has indicated in the attached Certificate that he is familiar with the Local Rules of the United States District Court of the District of Massachusetts.

In further support of this motion, the Certificate of Mr. Stone is attached hereto as Exhibit

A. A filing fee of \$50 is enclosed with this motion.

WHEREFORE, Christopher B. Kaczmarek respectfully requests that this Court admit
Robert W. Stone *pro hac vice*.

LOCAL RULE 7.1 CERTIFICATION

Counsel for Defendant Russell Dodson hereby certifies that he has conferred with
counsel for Plaintiff Ascential Software Corporation and has attempted in good faith to resolve
the issue raised in Defendant's Motion to Permit Robert W. Stone to Appear *Pro Hac Vice*.

Respectfully submitted,

RUSSELL DODSON

By his attorneys,



James S. Dittmar, P.C. (BBO #126320)

Robert M. Hale (BBO #217710)

Christopher B. Kaczmarek (BBO #647085)

GOODWIN PROCTER LLP

Exchange Place

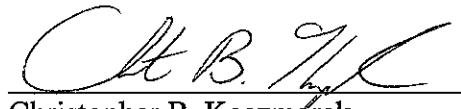
Boston, MA 02109

Tel: (617) 570-1000

Dated: July 14, 2004

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 14, 2004, a true and correct copy of the
Motion To Permit Robert W. Stone To Appear Pro Hac Vice was served by hand upon Daniel
E. Rosenfeld, Esq. and Amy B. Abbott, Esq., Kirkpatrick & Lockhart, LLP, 75 State Street,
Boston, MA 02109



Christopher B. Kaczmarek